

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

Case no. 18-cr-20597

vs.

Hon. Laurie J. Michelson  
United States District Judge

ZACK J. THOMAS,

Defendant.

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**STIPULATED PROTECTIVE ORDER FOR  
DISCOVERY MATERIALS**

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For the reasons stated in the government's Motion for Protective Order, it is hereby ORDERED under Rule 16(d) of the Federal Rules of Criminal Procedure:

1. Any and all discovery material provided in this case by the Government to Defendant is to be used by Defendant and his counsel solely for the preparation of their defense. No disclosure of these materials is authorized except as necessary to the preparation of the defense in this case, and such determination of necessity is to be made by counsel for the Defendant, not by the Defendant himself. This limitation applies to all discovery provided by the Government in this criminal action, including discovery provided after issuance of this Order.

2. Disclosure of discovery materials for purposes related to defense of the

criminal case is permitted to: (a) members of the defense team, consisting of counsel, co-counsel, paralegals, investigators, litigation support personnel, the Defendant, and secretarial staff; (b) experts or consultants retained to assist in preparation of the defense; (c) potential witnesses who are deemed necessary by the defense team in connection with this case; and (d) this Court.

3. Counsel for defendant shall not allow their client to retain any audio or video recordings provided in discovery by the government.

4. That counsel for the defendant: (a) shall not allow his client, or any other potential witness, to retain any audio or video recordings provided in discovery by the government, absent further order by this Court; (b) will take all reasonable steps necessary to ensure that government discovery materials are not improperly disclosed or distributed; and (c) shall destroy or return the government discovery materials upon the conclusion of this matter.

SO ORDERED.

Date: November 7, 2018

s/Laurie J. Michelson  
United States District Judge